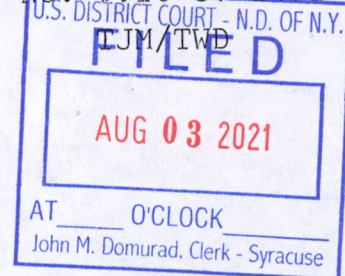


UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

TIMOTHY E^{II} LANDO, JR.,

Plaintiff,

Case No. 9:18-cv-1472



v.

STEVEN A^{II} CLAUDIO, TAMMY GRONAU,
BRIAN REED and JASON RHODES,

Defendants.

LEAVE TO FILE SUPPLEMENTAL COMPLAINT

Plaintiff, Timothy E. Lando, Jr., moves this Court;

1. For the entry of an order pursuant to Fed. R. Civ. P. 19, 20 and 21 to add Richard Oliver, Parole Officer as a Defendant in this cause and directing service of process upon him; and

2. For the entry of an order pursuant to Fed. R. Civ. P. 19, 20 and 21 to add plaintiff's Children TEL and CML as the Plaintiffs' in this cause.

In support of this motion, Plaintiff, Timothy E. Lando, Jr., states as follows;

1. Fed. R. Civ. P 21 provides in relevant part that parties may be added by order of the court on motion of any party at any stage of the action and on such terms as are just.

2. Fed. R. Civ. P. 19(a) provides in relevant part that a person who is subject to service of process and whose joinder will not deprive the court of jurisdiction over the subject matter of the action shall be joined as a party to the action if in the party's absence complete relief cannot be accorded among those already parties, or if, under certain circumstances, the party claims an interest relating to the subject action.

3. Fed. R. Civ. P. 20(a) provides in relevant part that persons may be joined in one action as Defendants if there is asserted against them a right to relief in respect of a series of occurrences and if any question of law or fact common to all defendants will arise.

4. Fed. R. Civ. P. 15(d) provides in relevant part that upon motion of a party the court may permit the party to serve a Supplemental pleading setting forth events that have happened since the date of the pleading sought to be supplemented.

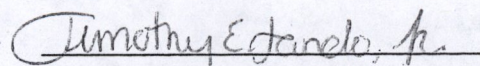
5. The parties sought to be added as Defendant by this motion are subjected to service of process and their joinder will not deprive the Court of jurisdiction over the subject matter of this action.

6. Attached and made a part of this Motion is a copy of the Supplemental Complaint proposed to be filed if this Motion is granted. The Supplemental Complaint sets forth events that have happened since the date of the Original Complaints in this cause.

WHEREFORE, Plaintiff, Timothy E. Lando, Jr., asks that the Motion be granted and that an order be entered in substantially the form attached to this Motion.

Dated: July 30, 2021.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Timothy E. Lando, Jr.", is written over a horizontal line.

Timothy E. Lando, Jr.

Wyoming Corr. Fac.

P.O. BOX 501

Attica, N.Y. 14011-0501

cc: tel/jsr